

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	Case No. 19-CR-10080-NMG
	)	
GAMAL ABDELAZIZ, et al,	)	
	)	
Defendants.	)	

**MOTION FOR PRO HAC VICE ADMISSION OF DAVID VAUGHN**

NOW COMES, Glenn A. MacKinlay and respectfully requests that this Court permit David P. Vaughn to appear *pro hac vice* as co-counsel for Alex Garfio, Alexandra Reisman (nee Bitterlin), Scott Wandzilak, Marko Pintaric, and Kurt Schuette in all proceedings in the above-captioned action, pursuant to L.R. 83.5.3.

In support of this motion, counsel states as follows: Mr. Vaughn is the principal at the Vaughn Law Offices located at Two California Plaza, 350 S. Grand Ave., Suite 3550, Los Angeles, CA 90071. He has been retained, along with Glenn A. MacKinlay of McCarter & English, LLP, 265 Franklin Street, Boston, Massachusetts, to represent Alex Garfio, Alexandra Reisman (nee Bitterlin), Scott Wandzilak, Marko Pintaric and Kurt Schuette in this matter. *See* Vaughn Affidavit, attached as Exhibit A.

In his affidavit, Attorney Vaughn states:

1. He is a member of the bar in good standing of the State of California (admitted December 23, 1987). *See* Certificate of Standing of the State Bar of California, attached as Exhibit B;

2. He is not currently the subject of any disciplinary proceedings as a member of the bar;
3. He has not previously had a pro hac vice admission to this Court revoked for misconduct;
4. He has read and agrees with the Local Rules of the United State District Court for the District of Massachusetts.

**CONCLUSION**

WHEREFORE, local counsel for Plaintiff respectfully requests that the Court grant this motion and permit David P. Vaughn to appear as co-counsel in all proceedings in the above-referenced action pursuant to L.R. 83.5.3.

Respectfully submitted,

s/ Glenn A. MacKinlay

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**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1**

I, Glenn A. MacKinlay, hereby certify that counsel has attempted to confer with counsel for the government, and with counsel for the defendants, Gamal Abdelaziz and John Wilson, in good faith with respect to the instant motion to resolve or narrow the issues presented herein.

Date: September 16, 2021

s/ Glenn A. MacKinlay  
Glenn A. MacKinlay

**CERTIFICATE OF SERVICE**

I hereby certify that on this date this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants.

s/ Glenn A. MacKinlay  
Glenn A. MacKinlay